

# **EXHIBIT E**

**Summary of Counts in Consolidated Complaints Against Prince Salman**

References in chart are to count numbers in complaint

<b>COUNT</b>	<b><u>Ashton</u></b>	<b><u>Burnett (NY)</u></b>	<b><u>Burnett (DC)</u></b>	<b><u>Federal Insurance</u></b>	<b><u>Barrera</u></b>	<b><u>Salvo</u></b>
Torture Victim Protection Act	5	2	2	6	5	5
Anti-Terrorism Act	4	3	3	10	4	4
Alien Tort Claims Act	(5)	4	4	-	-	-
Wrongful Death	1	5	5	2	1	1
Negligence	-	6	6	11	-	-
Survival	2	7	7	3	2	2
Negligent/Intentional Infliction of Emotional Distress	-	8	8	5	-	-
Conspiracy	-	9	9	7	-	-
Aiding & Abetting	-	10	10	9	-	-
RICO (1962(a))	-	11	11	8	-	-
RICO (1962(c))	-	12	12	-	-	-
RICO (1962(d))	-	13	13	-	-	-
Punitive Damages	7	14	14	12	7	7
Assault & Battery	3	-	-	4	3	3
Nuisance	-	-	-	-	-	-
Property Damage	8	-	-	-	8	-
Trespass	-	-	-	1	-	-

**NOTE:** These charts are based on the following versions of the complaints: Ashton ("Third Amended Master Consolidated Complaint," filed Sept. 5, 2003); Burnett (N.Y.) ("Amended Complaint," filed Sept. 5, 2003); Burnett (DC) ("Third Amended Complaint"); Federal Insurance ("First Amended Complaint," filed March 10, 2004). On March 10, 2004, the plaintiffs in Ashton filed a "Fourth Amended Consolidated Master Complaint." The actual amendment, however, consisted only of an amended caption; all substantive allegations related to the Ashton plaintiffs' claims are contained only in the Third Amended Consolidated Master Complaint. Also, some of the complaints assert other counts that do not name Prince Salman as a defendant. See Ashton, Count 6; Burnett (NY and DC) Counts 1, 15; Barrera Count 6; Salvo Count 6.